



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 12, 2018

**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Jacob Chait*, S1 17 Cr. 105 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter in order to update the Court regarding the Government's progress in reviewing discovery in light of the issues previously disclosed to the Court and to defense counsel in the above-captioned case.

As the Court is aware, on February 5, 2018, the defendant entered a plea of guilty to the above-referenced Information. Nevertheless, the Government is continuing to review the materials previously described to the Court – including email files of members of the prosecution team, both past and present, as well as files from U.S. Fish & Wildlife Service personnel that it previously identified as either having been identified on Rule 6(e) letters or having had communications with the defendant – for any discoverable items contained therein. To date, the Government has not identified any additional Rule 16 material. The Government intends to continue its review, which is approximately halfway complete, and will produce any materials it identifies to defense counsel on a rolling basis.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Eun Young Choi  
Elizabeth A. Hanft  
Assistant United States Attorney

cc: Carlos Ortiz, Esq./Mayling Blanco, Esq./Anna Svensson, Esq. (by ECF)